

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

07 CA 11538 RCL CIVIL ACTION
NO. _____

FILED
IN CLERKS OFFICE

2007 AUG 17 P 1:06

U.S. DISTRICT COURT
DISTRICT OF MASS.

AUDRONE BATAVITCHENE
Plaintiff,

v.

CITY OF QUINCY ENGINEERING
DEPARTMENT *GEORGE CLARK*
Defendant

MAGISTRATE JUDGE *Sarkin*

COMPLAINT FOR RELIEF

Parties

1. Plaintiff Audrone Batavitchene resides and owns 29 Packards Lane Quincy, Massachusetts.
2. Defendant City of Quincy Engineering Department George Clark.

Facts

3. February 2005, City of Quincy Engineering Department issued several Requests regarding proposed addition at 29 Packards lane Quincy, MA Case # 04-113
4. July 27th, 2005 City of Quincy Board of Appeals Under The Zoning By-Law Granted Notice Of Decision Case # 04 – 113. An appeal of this decision is governed by M.G.L chapter 40 section 17.
5. April 24th, 2006 City of Quincy Building Department Granted Building Permit # 134849 to add four car garage with two stories above as per plan.

6. On or about February, 2007 my representative licensed Massachusetts Civil Engineer Sean Hardy hand delivered proposed utility lay out plans to City of Quincy Engineering Department for review.

7. On or about March, 2007 I had a meeting with Mr. G. Clark Engineering Director City of Quincy regarding utility plans, where I was informed that the plans Cannot be reviewed because Heather Sargent from Quincy Conservation Commission Would not allow .

8. In the summer of 2006 Heather Sargent from Quincy Conservation Commission started to require from us a bribe of one hundred and two thousand Dollars if we want to finish the construction project and she will be interfering And hindering the process until she receives the money.

9. I refused to give and intent not to give the bribe to municipal employee.

WHEREFORE, the plaintiff pray for relief as fallows:

1. A determination by this Honorable Court that Engineering Department of City of Quincy should review utility plans as they required in February, 2005
2. Such other and further relief as the Court deems fit and just.

Respectfully submitted,

Audrone Batavitchene MD.Ph.D. RN. MSN.

Plaintiff Pro Se

8-17-07 Audrone Batavitchene

Audrone Batavitchene, MD PhD,RN,MSN

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